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*Attorneys for Plaintiff Ti'a Joseph***UNITED STATES DISTRICT COURT****DISTRICT OF NEVADA**

TI'A JOSEPH, an individual;

Plaintiff,

v.

ELITE MEDICAL CENTER, LLC, a
Domestic Limited-Liability Company;

Defendant.

Case No.: 2:22-CV-00703-JAD-NJK

**STIPULATION AND ORDER
EXTENDING TIME TO FILE
PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION TO COMPEL
ARBITRATION (ECF NO. 19)****(First Request)** ECF No. 20

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

Plaintiff TI'A JOSEPH ("Plaintiff") and Defendant ELITE MEDICAL CENTER, LLC ("Defendant"), by and through their counsel of record, hereby stipulate and agree to take that the court approve the extension of time for Plaintiff to file her response to Defendant's Motion to Compel Arbitration [ECF No. 19] filed on July 8, 2022. Plaintiff's response is currently due on July 22, 2022. This is the first request for an extension of time to oppose the Motion.

Plaintiff's counsel, which is a small firm of only two attorneys, is currently preparing for a two-week long trial in the United States District Court, District of Nevada, Case No.2:17-cv-00880-JCM-VCF, which is on track and very likely to go on August 8, 2022. Additionally, the head paralegal at Plaintiff's firm is on maternity leave and has been since April 20, 2022, and the firm's office manager is currently out with COVID-19. As a result, Plaintiff's firm has been significantly hindered in its ability to devote adequate time to drafting a response due to trial preparations and being short staffed. The parties aver that this is the first stipulation for an extension of time with

1 respect to this Motion, that the requested extension will not alter any date previously set by the Court
2 in this matter, and this request is made in good faith and not for purposes of delay.

3 IT IS HEREBY STIPULATED AND AGREED that Plaintiff's Opposition to Defendant's
4 Motion to Compel Arbitration shall be due **August 5, 2022**.

5 DATED this 13th day of July 2022

DATED this 13th day of July 2022

6 /s/ Cory M. Ford

/s/ Crane M. Pomerantz

7 **LAGOMARSINO LAW**

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14 **IT IS SO ORDERED.**

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UNITED STATES DISTRICT JUDGE

DATED: July 19, 2022